



Housatonic Resources Recovery Authority

Testimony **IN SUPPORT with modifications** RB 5139
AN ACT CONCERNING THE EXTENDED PRODUCER RESPONSIBILITY
FOR TIRES

Environment Committee Public Hearing – Friday February 25, 2022

To: Honored Co-Chairs, Sen. Cohen and Rep. Gresko, and distinguished Members of the Environment Committee

The Housatonic Resources Recovery Authority, is the regional, governmental, solid waste and recycling authority for 14 Municipalities in Western Connecticut that include *Bethel, Bridgewater, Brookfield, Danbury, Kent, New Fairfield, New Milford, Newtown, Redding, Ridgefield, Roxbury, Sherman & Weston and Wilton*.

The State of Connecticut urgently needs to improve material management programs that will address the state's solid waste issues. Extended Producer Responsibility legislation creates a circular economy and moves away from a linear economy of "make, take and waste".

The HRRRA supports (*with modification*) RB 5139 that would establish a stewardship program for tires.

Tires – the concern:

- Many municipalities do not have cost-effective outlets for tires received by residents.
- Consumers are currently assessed a \$5 disposal fee. The fee was put into place as an effective way to manage unwanted tires at the point of purchase of new tires. Although the majority of the time this program is effective, there are many consumers who reject the fee and have the retailer place the tires inside the vehicle seeking alternative disposal, often leading to illegal dumping.
- Public Works collects those illegally dumped tires on public property including the roadside leaving the towns the party responsible for the cost of disposal.
- Many towns try to avoid residential dumping by accepting tires at no cost, leaving the sole burden of the cost of disposal on the municipal.
- Since the closure of Sterling, many municipalities have found themselves struggling with cost effective and reliable disposal options.
- Some third-party recyclers/transporters are known to pickup large quantities of tires from retailers, get paid for the service, pull off the "good-tires" and illegally dump large quantities of spent tires that are not resalable.
- Illegally dumped tires are a direct result of market failure and economic inefficiencies.
- Due to the lack of disposal markets, tires are discarded directly into the environment in landfills and open tire stockpiles or are randomly dumped.¹
- All these disposal methods involve costs such as transportation and processing and social costs in the form of risks to human health and the environment.¹

- Stockpiled tires can catch fire and burn indefinitely or provide breeding grounds for disease-carrying mosquitoes.¹
- Illegally dumped tires are costly to clean-up and have a negative impact to the environment.
- In a 2020 study of the cause of acute mortality of adult coho salmon, scientists identified tire-derived chemicals as the sole cause of mortality.²
- Voluntary systems have not proven to work. The EPA has been studying the concerns of illegally dumped tires since the mid-1970's. To date no state has formally taken action to resolve the economic and environmental concerns and have left the cost burden of collection, transportation and disposal to local and state governments or private landowners.

The solution for tires:

HRRA supports extended producer responsibility to address the tires that are not managed at retail locations. EPR for tires exist in many countries, including Canada and 19 countries in Europe. Passing EPR for tires in the Connecticut would pave the way for manufacturers to share the burden with municipalities.

The program should include how the responsible party will ensure consumer convenience without accessing a fee, meet performance goals, provide effective education, and outreach, and fund the program.

The HRRA recognizes that the majority of tires are managed through the retail industry and gives significant credit to companies such as Lakin Tires in West Haven for their innovative collection and processing system. However, the tire industry has not addressed the large number of tires that do leak out of the system leaving municipalities with the burden of managing the end of life of their product.

In an effort to work collaboratively with industry, the HRRA has begun work with stakeholders to study the problem at the municipal level. The goal is to collect better data and to formulate a legislative proposal to address the costs and external burdens to local communities.

Sincerely,

A handwritten signature in cursive script that reads "Jennifer Heaton-Jones".

Jennifer A. Heaton-Jones
Executive Director, HRRA

¹<https://www.epa.gov/sites/production/files/2017-09/documents/ee-0075-01.pdf>

²<https://science.sciencemag.org/content/early/2020/12/09/science.abd6951>